

AFFIDAVIT

I, William Aldenberg, having been duly sworn, do hereby state:

1. I am a Special Agent with the Federal Bureau of Investigation (“FBI”). As such, I am an investigative or law enforcement officer of the United States within the meaning 18 U.S.C. §2510(7), and an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in 18 U.S.C. §2516. I have been employed as a Special Agent with the FBI since July 2002. I am currently assigned to the FBI Joint Terrorism Task Force (“JTTF”) and I am one of the co-case agents on the investigation described in this Affidavit. During my tenure at the FBI, I have written and executed dozens of search warrants, which have resulted in the seizure of illegal contraband and evidence of a variety of violent crimes. I have been involved in dozens of investigations involving various criminal activities to include violent crimes, illegal distribution of controlled substances, and threats to commit acts of violence, which have resulted in the arrest and conviction of hundreds of individuals. I have also received training, both formal and informal, on a wide variety of topics related to criminal investigations and violations of federal criminal law through the FBI’s training academy in Quantico, Virginia and at duty stations throughout my career.

2. I am submitting this Affidavit in support of an application for a criminal complaint charging that from on or about December 4, 2022, through on or about December 8, 2022, YANELIS LIZBETH LARA (“LARA”) (YOB 2000) did, through the use of an instrument of interstate and foreign commerce, and in or affecting interstate and foreign commerce, willfully make threats, and maliciously convey false information knowing the same to be false,

concerning an attempt or alleged attempt being made, or to be made, to kill, injure, and intimidate any individual and unlawfully to damage and destroy any building, vehicle, and other real or personal property by means of fire or an explosive, in violation of 18 U.S.C. §844(e), and did transmit in interstate and foreign commerce communications containing any threat to injure the person of another, in violation of 18 U.S.C. §875(c).

3. The statements contained in this Affidavit are based on my own investigation and upon information provided to me by other law enforcement officials, witnesses, and the victim. This Affidavit is submitted for the limited purpose of establishing probable cause to conclude that LARA committed violations of 18 U.S.C. §§844(e) and 875(c). It therefore does not set forth all of the information that I and other law enforcement personnel have obtained during the course of this investigation.

Threats to Bomb and Shoot

4. Point Group Care doing business as AdviniaCare (“AdviniaCare”) operates a number of short and long term nursing care facilities in Massachusetts and Florida, including nursing care facilities in Naples, Florida, and Chelsea, Fall River, Northbridge, Provincetown, Salem, and Wilmington, Massachusetts, among others.

5. On Sunday, December 4th, 2022, at approximately 3:29 AM, AdviniaCare was sent, through a website operated for AdviniaCare by a third party¹, the following email from Gmail account jwesleygran@gmail.com:

¹ The third party operator of AdviniaCare’s website communication system routes communications through a server outside of the Commonwealth of Massachusetts. Therefore,

Hi, I am experiencing extreme dissatisfaction with AdviniaCare and the company policies. If these policies aren't change [sic] I will bomb every fucking AdviniaCare location. Your days are fucking numbered.

6. At mid-morning on December 4, when the email was discovered on their system, AdviniaCare notified the Massachusetts State Police. The Massachusetts State Police directed AdviniaCare to notify the local police departments in each municipality in which AdviniaCare had a facility. AdviniaCare made emergency notices to the police departments in Northbridge, Wilmington, Fall River, Brewster, and Salem, Massachusetts, as well as police departments in other Massachusetts and Florida communities where it had facilities.

7. Police Departments in many of these municipalities responded by sending officers and other emergency personnel to AdviniaCare facilities. For instance, the Northbridge Police Department responded to AdviniaCare's facility located at 85 Beaumont Drive in that town, dispatching three police units, one ambulance, and two fire units. The Massachusetts State Police bomb squad also responded to the Northbridge facility. Emergency personnel searched the facility and remained on scene for two hours. Nothing was discovered. The police departments in Wilmington, Fall River, Brewster, and Salem also sent officers to AdviniaCare facilities in their municipalities.

8. AdviniaCare also alerted the staff at each of its facilities as well as the families of the patients at each facility. AdviniaCare staff was placed on heightened alert and more

communications from any person via this website system would necessarily be transmitted in interstate commerce. As set forth more generally in this affidavit, those communications also affected interstate commerce given the nature of AdviniaCare's business.

stringent security protocols were implemented at each facility. These notices caused substantial distress in staff, patients, and families of patients. In the days following the first threat, some care staff declined to work for fear of being harmed.

9. On December 5, 2022, at approximately 5:14 PM, AdviniaCare's Northbridge, Massachusetts facility was sent the following message through the AdviniaCare website messaging service:

I will bomb every fucking AdviniaCare location, I will not waste time begging and pleading with corporate while they sit on their asses doing nothing. Not only will I bomb but I will shoot up each fucking location. Biolence [sic] is always the answer. Your days are fucking numbered.

The person leaving this message provided the name "Jesse," and the email address jessem2@hotmail.com.

10. On December 5, 2022, at approximately 10:37 PM, AdviniaCare's Woodlands facility in Brewster, Massachusetts, was sent the following message through the website messaging service:

I will bomb every fucking AdviniaCare location within the next week, I will not waste time begging and pleading with corporate while they sit on their assess doing nothing. Not only will I bomb but I will personally shoot up each fucking location. If corporate does not respond, I will individually harm each employee. Violence is always the answer. Your days are numbered.

The person leaving this message provided the name "Holly," indicated that their telephone number was 978-744-0497, and provided an email address of holly@hotmail.com.

11. On December 5, 2022, at approximately 10:45 PM, AdviniaCare's Eastpointe facility in Chelsea, Massachusetts, was sent the following message through the website messaging service:

Violence is always the answer. Your days are numbered.

The person leaving this message provided the name "Holly," indicated that their telephone number was 323-343-0512, and provided an email address of holly@hotmail.com.

12. On December 5, 2022, at approximately 10:49 PM, AdviniaCare's Naples, Florida location was sent a message through the website messaging service:

I will personally BOMB every fucking AdviniaCare location, I will not waste time begging and pleading with corporate while they sit on their asses doing nothing. Not only will I bomb but I will shoot up each fucking location. If corporate does not respond, I will shoot each employee as well. Biolence [sic] is always the answer. Your days are numbered.

The person leaving this message provided the first name of "Healy," indicated that their telephone number was 407-836-9400, and their email address was healysbw@hotmail.com.

13. On December 5, 2022, at approximately 10:52 PM, AdviniaCare's Southpointe facility in Fall River, Massachusetts, was sent the following message through the website messaging service:

I will personally bomb every fucking AdviniaCare location, I will not waste time begging and pleading with corporate while they sit on their assess doing nothing. Not only will I bomb but I will personally shoot up each fucking location. If corporate does not respond, I will individually harm each employee. Violence is always the answer. Your days are numbered.

The person leaving this message provided the name “Merj,” indicated that their telephone number was 937-225-4146, and provided an email address of merj@hotmail.com.

14. On December 5, 2022, at approximately 10:55 PM, AdviniaCare’s Provincetown, Massachusetts facility was sent the following message through the website messaging service:

I will personally BOMB every fucking AdviniaCare location, I will not waste time begging and pleading with corporate while they sit on their asses doing nothing. Not only will I bomb but I will shoot up each fucking location. If corporate does not respond, I will shoot each employee as well. Violence is always the answer. Your days are numbered.

The person leaving this message provided the name “Brittany,” indicated that their telephone number was 973-225-4156, and provided an email address of Corporatewillbebombed@hotmail.com.

15. On December 8, 2022, at approximately 6:11 AM, AdviniaCare was sent the following email from jwesleygran@gmail.com:

I will bomb every fucking AdviniaCare Location, I will not waste time begging and pleading with corporate while they sit on their asses doing nothing. Not only will I bomb but I will also shoot up every fucking location. Violence is always the answer. Your days are fucking numbered.

16. On December 8, 2022, at approximately 6:28 PM, AdviniaCare was sent the following message through the website messaging service:

I will bomb every fucking AdviniaCare Location, I will not waste time begging and pleading with corporate while they sit on their assess doing nothing. Not only will I bomb but I will also shoot up every fucking location. Violence is always the answer. Your days are fucking numbered.

The person leaving this message provided a first name of “Dan,” indicated that their telephone number is 781-592-4300, and provided an email address of dan54@hotmail.com.

The Investigation

17. The threats prompted Northbridge Police Department detectives to seek the origin of the emails from jwesleygran@gmail.com. A search warrant served on Google, Inc. revealed the IP addresses used by this email address, including IP addresses owned by Comcast. Subsequent process served on Comcast for the physical location of those IP addresses revealed that at least one of the jwesleygran@gmail.com emails had been sent using the Wi-Fi located at 1000 Loring Ave, Apt B45, Salem, MA.²

18. On December 29, 2022, your affiant and another agent visited 1000 Loring Avenue, Apartment B45, Salem, Massachusetts to speak with the occupants. Upon arrival, we were greeted by LARA and her mother (“ID”). Both LARA and ID denied having any knowledge of the threats against AdviniaCare or the jwesleygran@gmail.com email address. ID stated that a number of individuals had been in and out of their apartment in preceding several weeks because her 17 year old daughter had passed away in early November 2022. It was apparent to your affiant that both ID and LARA were still grieving this loss. During the interview, LARA stated that she worked at AdviniaCare facility in Salem, Massachusetts as an activities aide for the residents.

² According to publicly available information, Google has no Gmail servers in Massachusetts. Therefore, any Gmail sent from within Massachusetts would necessarily be in interstate commerce in order to be routed from sender to recipient.

19. The following day, ID contacted your affiant by telephone. ID stated that she and LARA wanted to clarify some things that were said during the prior day's interview. ID stated that LARA was the one that sent the bomb threats to AdviniaCare, and that LARA did this because she was upset about her sister's death and the limited bereavement leave she received from AdviniaCare. LARA, who was also on this telephone call, verbally acknowledged that this is what had occurred.

20. On January 2, 2023, Agents interviewed LARA at her residence. ID and their family pastor were also present during this interview. LARA admitted to sending all the bomb threats to AdviniaCare, including the threats sent from jwesleygran@gmail.com and the threats sent through the AdviniaCare website messaging service. LARA said she sent the threats using her mobile telephone. LARA also admitted to using her mobile telephone to research telephone numbers to use in attempting to disguise her identity.

21. LARA explained that she was devastated by the death of her younger sister and because of this she was very angry. While AdviniaCare gave LARA three days of bereavement leave, LARA felt this was insufficient time to mourn her sister's death. While LARA was angry about the extent of bereavement leave, she admitted that she never asked her AdviniaCare supervisor if she could take additional time off, or seek other assistance from her employer. AdviniaCare confirmed that it had received no requests for additional bereavement leave from LARA.

Conclusion

22. On the basis of the foregoing information, there is probable cause to conclude that from on or about December 4, 2022, through on or about December 8, 2022, YANELIS LIZBETH LARA did, through the use of an instrument of interstate and foreign commerce, and in or affecting interstate and foreign commerce, willfully make threats, and maliciously conveyed false information knowing the same to be false, concerning an attempt or alleged attempt being made, or to be made, to kill, injure, and intimidate any individual and unlawfully to damage and destroy any building, vehicle, and other real or personal property by means of fire or an explosive, in violation of 18 U.S.C. §844(e), and did transmit in interstate and foreign commerce communications containing any threat to injure the person of another, in violation of 18 U.S.C. §875(c).

William B. Aldenberg /by Paul G. Levenson
WILLIAM B. ALDENBERG
Special Agent
Federal Bureau of Investigation

Notice is hereby provided that, pursuant to Federal Rule of Criminal Procedure 4.1, the Affiant was sworn by telephone on this
19th day of January 2023.





JON. PAUL G. LEVENSON
UNITED STATES MAGISTRATE JUDGE